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REMARKS

Applicants respectfully request reconsideration of this patent application, particularly in view of the following remarks. Applicants hereby authorize the Commissioner to charge any necessary fees to Deposit Account 19-3550.

**Claims Rejection - 35 U.S.C. §103
THE LUCKE PATENT IN VIEW OF THE GEBHARDT ET AL. PATENT
AND THE SMITH ET AL. PATENT**

The Examiner has rejected Claims 26-45 under 35 U.S.C. §103 as unpatentable over Lucke, U.S. Patent 5,211,106, in view of Gebhardt et al., U.S. Patent 6,044,833 and further in view of Smith et al., U.S. Patent 4,965,435. Applicants respectfully traverse this rejection in view of the following remarks.

The Examiner alleges that the Lucke Patent teaches a cooking oven having a cooking chamber with an air recirculation loop, a conveyor, an upper manifold, a lower manifold and a plurality of louvers and baffles connected with respect to the upper and lower manifolds for controlling air flow between the manifolds. The Examiner acknowledges that the Lucke Patent does not teach a plurality of louvers directing air flow to each of the upper manifold and the lower manifold, an adjustment arm for the louvers, a curved heat exchanger and a plurality of interchangeable modules.

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In addition, the Examiner alleges that the Smith et al. Patent teaches a cooking oven having a manual adjustment arm extending from the oven for external operation of a louver inside the oven. The Examiner further alleges that the Smith et al. Patent teaches a plurality of separate and individual modules and that such teachings render certain claims of the subject invention obvious in view of the combination with the Lucke Patent and/or the Gebhardt et al. Patent.

Applicants have amended the claims to require that an adjustment arm, connected with respect to the plurality of louvers, opens at least one louver of the plurality of louvers and correspondingly closes at least one other louver of the plurality of louvers to control air flow between the upper manifold and the lower manifold. The Lucke Patent appears to teach a pair of baffles 44, 46 that control the flow of air into the upper and lower spaces 30, 32. Nowhere does the Lucke Patent teach or suggest a control arm that opens one or more louvers and correspondingly closes one or more other louvers to distribute air flow between an upper manifold and a lower manifold. The Examiner alleges that the Smith et al. Patent, which teaches a gate that manually opens and closes to distribute air between two plenums, when combined with the teachings of the Lucke Patent renders the claimed invention obvious. Applicants urge that the Smith et al. Patent does not teach or suggest a plurality of louvers arranged in arrays that extend along a length of a conveyor and are correspondingly opened and closed by an adjustment arm. Nowhere do the cited

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references teach or suggest a group of louvers positioned above and below the conveyor that may be opened to direct air flow into an upper manifold and then correspondingly closed relative to the lower manifold to further effect such desired air flow.

Applicants invention requires a corresponding movement between two groups of louvers. The cited prior art does not teach or suggest such a responsive opening and closing of two groups of louvers. The Smith et al. Patent teaches a gate that swings between two positions and the Lucke Patent teaches a pair of independent louvers. A combination of these references would result in a pair of independently moveable louvers, not a group of louvers that open and close in response to an opposite action of a second group of louvers. In addition, numerous louvers, as herein claimed by Applicants, provide a more efficient control of air flow than a single large gate disclosed in the Smith et al. Patent resulting in the ability of Applicants' claimed invention to quickly and efficiently adjust air flow and therefore temperatures on the cooking surface.

Applicants urge that the cited art does not teach or suggest Applicants' claimed invention as required by 35 U.S.C. §103.

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CONCLUSION

In view of the above Amendment and remarks, Applicants sincerely believe that Claims 26-45 of this patent application are now in condition for allowance and early allowance is respectfully requested.

Respectfully submitted,



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